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### **REDACTED - FOR PUBLIC INSPECTION**

July 1, 2014

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

ATTENTION: WIRELINE COMPETION BUREAU

RE: Form 481 ETC filing pursuant to Sections 54.313 and 54.422 SAC 361505, MN, Wikstrom Telephone Company, Inc. *Connect America Fund* WC Dockets 10-90, *11-42 and 14-58* 

Dear Ms. Dortch:

Pursuant to Sections 54.313 and 54.422 of Commission's Rules, Wikstrom Telephone Company, Inc., MN, SAC 361505 is filing its Form 481 High Cost and Low-Income Annual Report.

Wikstrom Telephone Company, Inc. seeks confidential treatment under the Protective Order in this proceeding for Section 54.313(f)(2) financial information in the 481 filing <sup>1</sup> and for Section 54.202(a) 5 Year Service Quality Improvement Plan portion of the 481 filing pursuant to the Request for Confidential Treatment attached to this filing. Pursuant to the Protective Order, one copy of the confidential document and two copies of the redacted version are provided. The Redacted version is also being filed on the Electronic Comment Filing System.

Please address any correspondence regarding this transmittal to the attention of Tom Campbell at the following address, e-mail or telephone number.

Sincerely,

Tom Campbell

**Telecommunications Consultant** 

tcampbell@otcpas.com

651-621-8511 (v) 651-483-2467 (f)

**Enclosures** 

CC: Mr. Charles Tyler, FCC Telecommunications Access Policy Division (two copies confidential)

<sup>1</sup> See Protective Order 27, WC Docket Nos. 10-90 et al, Rec 14231 rel. November 16 ("Order")

### Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of	)	
Connect America Fund	) )	WC Docket No. 10-90
Lifeline and Link Up Reform	)	WC Docket No. 11-42
ETC Annual Reports and Certifications	)	WC Docket No. 14-58

### REQUEST FOR CONFIDENTIAL TREATMENT

Wikstrom Telephone Company, Inc., SAC 361505, ("the company") requests that the portion of its Form 481 pertaining to the 5-Year Service Quality Improvement Plan be granted confidential, non-public treatment pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457, 0.459, and related provisions of the Freedom of Information Act ("FOIA"), including 5 U.S.C. § 552(b)(4) ("Exemption 4"). Form 481 contains information regarding the company's Section 54.202(a) 5- Year Service Quality Improvement Plan including capital expenditures and operating expenses. Release of such information would supply a roadmap to competitors regarding confidential build out plans and study area demographics. In addition, the document contains confidential information that is not customarily disclosed to the public or made available within the telecommunications industry. Information in support of the company's request for confidential treatment pursuant to Section 0.459(b) of the Commission's Rules, 47 C.F.R. § 0.459(b), is provided below.

### I. WIKSTROM TELEPHONE COMPANY, INC.'S FORM 481 SATISFIES THE REQUIREMENTS OF § 0.459 OF THE COMMISSION'S RULES

The material for which the company seeks confidentiality falls squarely within the requirements of Section 0.459 of the Commission's rules. As demonstrated below, the company has satisfied each of the elements of Section 0.459, and disclosure of this information would result in competitive harm to the company.

- (1) Identification of the specific information for which confidential treatment is sought. The company requests confidential treatment for the portion of Form 481 required by 47 C.F.R. § 54.313 related to the Section 54.202(a) 5- Year Service Quality Improvement Plan. The information bears the legend "Confidential Financial Information. The specific information falls into the categories of: 1. Capital Expenditures, 2. Operating Expenses and 3. Area Demographics
- (2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission. The information is required to be produced annually by 47 C.F.R. § 54.313. The proceedings are WC Docket No. 10-90 and WC Docket No. 11-42. The documents will also be submitted in WC Docket NO. 14-58
- (3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged. The information for which confidentiality is requested is "financial" and commercial in nature. The information is "confidential" in that it "would customarily not be released to the public." The courts have elaborated that material "is 'confidential' . . . if disclosure of the information is likely to have either the following effects: (1) to impair the government's ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained." Both of the considerations apply in this instance, as further explained in point (5) below.
- (4) Explanation of the degree to which the information concerns a service that is subject to competition. All of the services provided by the company are subject to intense existing or potential competition.

<sup>&</sup>lt;sup>1</sup> See Board of Trade of the City of Chicago v. Commodity Futures Trading Comm'n, 627 F.2d 392, 403 & n.78 (D.C. Cir. 1980) (courts have given the terms "commercial" and "financial, as used in Section 552(b)(4), their ordinary meanings).

<sup>&</sup>lt;sup>2</sup> Critical Mass Energy Project v. NRC, 975 F.2d 871, 873 (D.C. Cir. 1992) (citing the Senate Committee Report).

<sup>&</sup>lt;sup>3</sup>Nat'l Parks and Conservation Ass'n v. Morton, 498 f.2d 764, 770 (D.C. Cir. 1974) (footnote omitted); see also Critical Mass Energy, 975 F.2d at 873.

- (5) Explanation of how disclosure of the information could result in substantial competitive harm. If the information were publicly available, it would supply competitors with financial information not ordinarily available to the public. Specifically, rural telephone service has historically lent itself to "cherry picking" by competitors that choose to only serve low cost areas. Release of this specific build out and operating expense information would allow competitors to gain an unfair advantage.
- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure. The information for which the company seeks confidential treatment is information that the company does not customarily release to the public. The company also limits the internal circulation of this information to only those with a need to know.

Consistent with 47 C.F.R. § 0.459(a), the items for which confidentiality is requested are being submitted with, and are covered by, this request. This request for confidentiality - as well as the documents subject to this request - are being filed in hard copy and/or electronic copy.

- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties. The documents and information for which confidentiality is sought are not made available to the public and have not been disclosed to third parties, except to those entities identified in 47 C.F.R. § 54.313(i). For those disclosures, the company has requested confidential treatment by the entities for the same information.
- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure. Given the sensitive nature of the information for which confidentiality is requested, the prospect of serious competitive harm, the company requests that confidential treatment apply indefinitely.

### II. CONCLUSION

For these reasons, pursuant to Sections 0.457 and 0.459 of the Commission's Rules, the company requests that the portion of Form 481 relating to the Section 54.202(a) 5 - Year Service Quality Improvement Plan be treated as confidential under the Commission's rules and precedent and withheld in their entirety from public inspection, and that any distribution of them within the Commission should be limited to a "need to know" basis. In the event that any person or entity requests access to the documents or seeks to make any or all of them part of the public record, the company requests to be notified immediately so that it can oppose such request or take other action as necessary to safeguard its interests and the interests of consumers.

Sincerely,

Tom Campbell

**Telecommunications Consultant** 

wow Aughell

tcampbell@otcpas.com

651-621-8511 (v)

651-483-2467 (f)

### FCC Form 481 - Carrier Annual FEDACTED - FOR PUBLIC INSPECTION OMB Control No. 3060-0986/OMB Control No. 3060-0819 Data Collection Form

<010>	Study Area Code	361505
<015>	Study Area Name	WIKSTROM TEL CO, INC
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Tom Campbell
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	tcampbell@otcpas.com

<035>	Contact Telephone Number: 6516218511 ext. Number of the person identified in data line <030>		
<039>	Contact Email Address: Email of the person identified in data line <030> tcampbell@otcpas.com	1	
			54.313 54.422
ANINILIA	I DEPORTING FOR ALL CARRIEDS		Completion Completion
AININUA	L REPORTING FOR ALL CARRIERS		Required Required (check box when complete)
<100>	Service Quality Improvement Reporting	(complete attached worksheet)	✓ ((((((((((((((((((((((((((((((((((((
<200>	Outage Reporting (voice)	(complete attached worksheet)	✓ ✓
<210>	< check box if no outages to report	Г	√
<300>	Unfulfilled Service Requests (voice)		
<310>	Detail on Attempts (voice)		
		(attach descriptive doc	ument)
<320>	Unfulfilled Service Requests (broadband)		<b>✓</b>
<330>	Detail on Attempts (broadband)	ļ	
		(attach descriptive da	cument)
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed 0.0		<b>1</b>
<420>	Mobile 0.0		
<430>	Number of Complaints per 1,000 customers (broadband)  Fixed    0 \cdot 0		<b>✓</b>
<440> <450>	Mobile 0.0		
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	✓ ✓
	361505mn510.pdf		
<510>		(attached descriptive document)	<b> </b>
		, , ,	
<600>	, , ,	(check to indicate certification)	<b>✓</b>
	361505mn610.pdf		
		(attached descriptive document)	<b>✓</b>
<610>			
<700×	Company Drice Offerings (voice)		
	Company Price Offerings (voice) Company Price Offerings (broadband)	(complete attached worksheet) (complete attached worksheet)	
<800>	Operating Companies and Affiliates	(complete attached worksheet)	
		es, complete attached worksheet)	
<1000>	Voice Services Rate Comparability	(check to indicate certification)	<b>√</b>
	361505mn1010.pdf		
<1010>	.	(attach descriptive document)	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
-1010		·	
<1100>	· Terrestrial Backhaul (Y/N)? (if	anot, check to indicate certification)	
<1110>		(complete attached worksheet)	
	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<b>√</b>
	Price Cap Carriers, Proceed to Price Cap Additional Documentation Works	heet	
	Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange	Carriers	1
<2000>		(check to indicate certification)	
<2005>	Date of Datum Comings Drossed to DOD Additional Description	(complete attached worksheet)	
<3000>	Rate of Return Carriers, Proceed to <u>ROR Additional Documentation Works</u>	(check to indicate certification)	✓ ************************************
<3005>		(complete attached worksheet)	<b>✓</b>
_			

(100) Se	(100) Service Quality Improvement Reporting	FCC Form 481	
Data Cc	Data Collection Form	OMB Control No. July 2013	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	361505	
<015>	Study Area Name	WIKSTROM TEL CO, INC	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell	
<032>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com	
<110>	Has your company received its ETC certification from the FCC?	(yes / no )	
<111>	If your answer to Line <1.10> is yes, do you have an existing $\$54.202(a)$ "5 year plan" filed with the FCC?	O O (ou/sah)	
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.  Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.	361505mn112.pdf	
	Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	Name of Attached Document	ument
<pre>&lt;113&gt; &lt;114&gt; &lt;115&gt; &lt;115&gt; &lt;116&gt; &lt;116&gt; &lt;117&gt; &lt;118&gt; </pre>	Maps detailing progress towards meeting plan targets Report how much universal service (USF) support was received How (USF) was used to improve service quality How (USF)was used to improve service coverage How (USF) was used to improve service capacity Provide an explanation of network improvement targets not met in the prior calendar year.		

Page 3

(200) Service Outage Reporting (Voice)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<015> Study Area Name	Study Area Name				WIKSTROM TEL CO,	L CO, INC					
<020> Program Year	Year				2015						
<030> Contact N	Contact Name - Person USAC should contact regarding this data	C should contac	t regarding this	data	Tom Campbell	1					
<035> Contact To	Contact Telephone Number - Number of person identified in data line <030>	- Number of pe	rson identified	in data line <0	30> 6516218511 ext.	ext.					
<039> Contact E	Contact Email Address - Email Address of person identified in data line <030>	il Address of pe	rson identified	in data line <c< th=""><th>30&gt; tcampbell@otcpas.com</th><th>tcpas.com</th><th></th><th></th><th></th><th></th><th></th></c<>	30> tcampbell@otcpas.com	tcpas.com					
<220> <a></a>	 b1>	 62>	<	 b4>	<c1></c1>	<c2></c2>	<u></u>	<b>\</b>	\$	\$	<del>\$</del>
Nu Re	9	Outage Start Outage Start Date Time	ō	no	Number of Customers Affected	Total	911 Facilities Affected	Service Outage Description (Check	Did This Outage Affect Multiple Study Areas	Service Outage	Preventative
						Customers	(Yes / No)	all that apply)	(Yes / No)	Resolution	Procedures

rerings including Voice Ratings including Voice Ratings including Voice Rating Area Code  by Area Name By Area Code  tact Name - Person USAC sho tact Telephone Number - Nur tact Email Address - Explain Loc.    Code	E Data FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	361505	WIKSTROM TEL CO, INC	2015	uld contact regarding this data Tom Campbell	a line <030>	Contact Email Address - Email Address of person identified in data line <030> tcampbell@otcpas.com	Effective Date 1/1/2014		<a3> <b1> <b2> <b2> <b2> <b2> <b2> <b2> <b2> <b2< th=""><th>SAC (CETC) Rate Type Service Rate Subscriber Line Charge State Universal Service Fee Service Charge Total Der line</th><th></th><th></th><th></th><th>See attached worksheet</th><th></th><th></th><th></th><th></th><th></th><th></th><th></th></b2<></b2></b2></b2></b2></b2></b2></b2></b1></a3>	SAC (CETC) Rate Type Service Rate Subscriber Line Charge State Universal Service Fee Service Charge Total Der line				See attached worksheet							
Out Study Area Code Out Study Area Code Out Study Area Name Out Study Area Code Out Study Area Code Out Study Area Name Out Study Area Code Out St					arding this data	identified in data line <030>	identified in data line <030>	1/1/2014		 	Rate Type											
Form  Area Code  Area Name - Person US, act Name - Person US, act Telephone Numbe act Email Address - Err ential Local Service C} state-wide Residenti tate  Exchange	ce Rate Data				AC should contact reg	r - Number of person	iail Address of person	narge Effective Date	ial Local Service Char													
	(700) Price Offerings including Voic Data Collection Form	Study Area Code	Study Area Name	Program Year	act Name - Person US	act Telephone Numbe	act Email Address - En	lential Local Service Cl	e State-wide Resident	<a1> <a2< td=""><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></a2<></a1>												

(710) Bro	(710) Broadband Price Offerings	FCC Form 48.1
Data Col	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013
<010>	<010> Study Area Code	361505
<015>	<015> Study Area Name	WIKSTROM TEL CO, INC
<020>	<020> Program Year	2015
<030>	<030> Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	<035> Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	<039> Contact Email Address - Email Address of person identified in data line <030> tcampbell@otcpas.com	tcampbell@otcpas.com

<d4>&gt;</d4>	Usage Allowance Action Taken When Limit Reached {select}												
<q3></q3>	Usage Allowance (GB)												
<d2></d2>	Broadband Service - Upload Speed (Mbps)												
<d1></d1>	Broadband Service - Download Speed (Mbps)												
<>>>	Total Rate and Fees					pac	501						
 	State Regulated Fees					- See attacl	workshoot	พบเกรเเฮฮเ =					
 b1>	Residential Rate						•						
<a2></a2>	Exchange (ILEC)												
<a1></a1>	State												
<711>		I	•										1

(800) Operating Companies			FCC Form 481
Data Collection Form			OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	361505		
<015> Study Area Name	WIKSTROM TEL CO,	O, INC	
<020> Program Year	2015		
<030> Contact Name - Person USAC should contact regarding this data	Tom Campbell		
<035> Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.		
<039> Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com	pas.com	
<pre>&lt;810&gt; Reporting Carrier Wikstrom Telephone Company, Inc.</pre>			
<811> Holding Company			
<812>			
<813> <a1></a1>		<a2></a2>	<a3></a3>
Affiliates		sac	Doing Business As Company or Brand Designation
	See atta	See attached worksheet	et

900) Tri	900) Tribal Lands Reporting	FCC Form 481
oata Co	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
3		
<010>		361505
<015>	Study Area Name	WIKSTROM TEL CO, INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<032>		0> 6516218511 ext.
<039>		(0) tcampbell@otcpas.com
<910>	Tribal Land(s) on which ETC Serves	Red Lake Indian Reservation
	J	
	34	361505mn920.pdf
<920>	Tribal Government Engagement Obligation	
		Name of Attached Document
If your	If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s) on line 920	
demon	demonstrates coordination with the Tribal government pursuant to	Select No. No. No.
§ 54.31	§ 54.313(a)(9) includes:	(AN)
<921>		Yes
	community anchor institutions.	
<922>	Feasibility and sustainability planning;	Yes
<923>		Yes
<924>		Yes
<925>		Yes
<926>		Yes
<927>	Compliance with Environmental Review processes	Yes
<928>	Compliance with Cultural Preservation review processes	Yes
<929>	Compliance with Tribal Business and Licensing requirements.	Yes

(1100) N	(1100) No Terrestrial Backhaul Reporting	FCC Form 481
Data Co	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	361505
<015>	Study Area Name	WIKSTROM TEL CO, INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<032>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com
<1120>	Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)	
<1130>	Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)	

T (000 F)		
(1200) 16	(1200) Terms and Condition for Lifeline Customers	FCC Form 481
Lifeline Data Coll	Lifeline Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	361505
<015>	Study Area Name	WIKSTROM TEL CO, INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<032>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com
		3615()5mm]210. ndf
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	
	1	Name of Attached Document
<1220>	Link to Public Website	
"Please check th or the website li § 54.422(a)(2) a annually report:	"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:	
<1221>	Information describing the terms and conditions of any voice    telephony service plans offered to Lifeline subscribers,	
<1222>	Details on the number of minutes provided as part of the plan,	
<1223>	Additional charges for toll calls, and rates for each such plan.	

(2000) Pı	(2000) Price Cap Carrier Additional Documentation	FCC Form 481
Data Col	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
Including	Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	July 2013
<010>	Study Area Code	361505
<015>	Study Area Name	WIKSTROM TEL CO, INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<032>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com
CHECK t	he boxes below to note compliance as a recipient of Incremental Connect Ameri	CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II
	support as set forth in 47 CFR § 54.313(b),(c),(d),(e	support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.
	Incremental Connect America Phase I reporting	
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}	
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}	
	Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}	
<2012>	2013 Frozen Support Certification	
<2013>	2014 Frozen Support Certification	
<20137	2015 Frozen Support Certification	<u> </u>
75057		<u>][</u>
<5015>	ZUID and future Frozen Support Certification	
	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	
<2016>	Certification Support Used to Build Broadband	
	Councet Amorice Direct II Described (AT CED & Ed 212(a))	
V2017	Connect America Phase II neporting (47 CFR § 54.515(e))	
/2010/	std year broadband service Certification	
<2019>	out year broaddand oervice certilication Interim Progress Certification	
ć		e 2021 contains the required information
<0707>	pursus cristic services of community and a recipient of CAF Phagean broyide itself provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the	te 2022, Sometimes in reduction of the state
	preceding calendar year.	
<2021>	Interim Progress Community Anchor Institutions	
		Name of Attached Document Licting Benitzed Information
		Name of Atlactica Document Listing Required mitorination

(3000) Rate Of Return Carrier Additional Documentation	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013
<010> Study Area Code	361505
VOTE CTURY ACCOUNTS	PART OF THE MODERATES

4010> St. 4010>	Study Area Code Study Area Name Program You Descou LEAC thould contact reasontling this data	361505 bitkgripon ript. co. ting
#	mos blinds Charleton	S
#	licon HSAC chould con	
∭	- Parson HSAC should con	
₽	אונפרר ועמווופ - דפוטטוו טשר אויטעוע נטוונפני ו פצפו עווים עמנם	Tom Campbell
	Contact Telephone Number - Number of person Identified in data line <0.30> Contact Email Address - Email Address of person identified in data line <0.30>	6516218511 ext.
CHECK the b (3010) P	מומכר בוותו נימת כסי בוותו נימת כסי כן לכוסון ותכומונים וו ממת ווור יססי	LCallippel1worcpas.com
	CHECK the boxes below to note compliance on its five year service quality plan (pursuant CFR § 54.313(f)(2). I further certify that the	n its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)[2). I further certify that the information reported on this form and in the documents attached below is accurate.
ž	Progress Report on 5 Year Plan Milestone Certificaton (47 CFR § 54.313(f)(1)(i)}	
Ple (3011) § 5, pro	Name of Attached Document Listing Required In Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information 012 contains the required information pursuant to sses of community anchor institutions to which began
(3012) Co	Community Anchor Institutions {47 CFR § 54.313(f)(1)(i)}	
(3013) IS y	is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) If yes, does your company file the RUS annual report	Name of Attached Document Listing Required Information (Yes/No) (Yes/No) (Yes/No)
Please che (3015) Ele	check these boxes to confirm that the attached document(s), on line 3017. Electronic copy of their annual RUS reports (Operating Report for	Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:  [77]
Tel (3016) Doc	Telecommunications Borrowers)  Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	above the comments
(3017) Ift rep	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	TOG T. / TOG TILLS OF TOG
(3018) Ift	if the response is no on line 3014, is your company audited?	Name of Attached Document Listing Required Information (Yes/No)
		}
(3019) Éit	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	rmat comparable to RUS Operating Report for Telecommunications
(3020) Dc	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	ash Flows
(3021) Ma	Management letter issued by the independent certified public accountant that performed the company's financial audit	performed the company's financial audit.
∓ tc cc	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § $54.313(f)(2)$ , contains:	
(3022) Co ind for	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications	
80 (3023) Un	Borrowers, Underlying information subjected to a review by an independent certified	
	public accountant Underlying information subjected to an officer certification. Document(s) for Balance Sheet, Income Statement and Statement of <u>Cash Flow</u> s	sh Flows
(3026) Att	Attach the worksheet listing required information	

Certification - Reporting Carrier	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	361505
<015>	Study Area Name	WIKSTROM TEL CO, INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

### TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

### Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. Name of Reporting Carrier: Signature of Authorized Officer: Date Printed name of Authorized Officer: Title or position of Authorized Officer: Telephone number of Authorized Officer: Filing Due Date for this form: Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment

under Title 18 of the United States Code, 18 U.S.C. § 1001.

	ion - Agent / Carrier ection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	361505	
<015>	Study Area Name	WIKSTROM TEL CO, INC	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell	
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.	·
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com	

### TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to	File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier
I certify that (Name of Agent) <u>Tom Campbell</u> also certify that I am an officer of the reporting carrier; my responsibilities inc agent; and, to the best of my knowledge, the reports and data provided to the	is authorized to submit the information reported on behalf of the reporting carrier. I lude ensuring the accuracy of the annual data reporting requirements provided to the authorized authorized agent is accurate.
Name of Authorized Agent: Tom Campbell	
Name of Reporting Carrier: WIKSTROM TEL CO, INC	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/29/2014
Printed name of Authorized Officer: Leslie Wikstrom	
Title or position of Authorized Officer: Vice President	
Telephone number of Authorized Officer: 2184362121 ext.	
Study Area Code of Reporting Carrier: 361505 F	iling Due Date for this form: 07/01/2014
, ,	forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment e United States Code, 18 U.S.C. § 1001.

### TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients	on Behalf of Reporting Carrier
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support reci the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information	
Name of Reporting Carrier: WIKSTROM TEL CO, INC	
Name of Authorized Agent or Employee of Agent: Tom Campbell	
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date: 06/29/2014
Printed name of Authorized Agent or Employee of Agent: Tom Campbell	
Title or position of Authorized Agent or Employee of Agent Consultant	
Telephone number of Authorized Agent or Employee of Agent: 6516218511 ext.	
Study Area Code of Reporting Carrier: 361505 Filing Due Date for this form: 07/01/201	4
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934 18 of the United States Code, 18 U.S.C. § 1001.	, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title

Attachments

(700) Price Offerings including Voice Rate Data	FCC Form 481	
Data Collection Form	OMB Control No. 3060-0	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013	
<010> Study Area Code	361505	

		July 2013
<010>	<010> Study Area Code	361505
<015>	<015> Study Area Name	WIKSTROM TEL CO, INC
<020>	<020> Program Year	2015
<030>	<030> Contact Name - Person USAC should contact regarding this data	Tom Campbell
<032>	<035> Contact Telephone Number - Number of person identified in data line <030> 6516218511 ext.	6516218511 ext.
<039>	<039> Contact Email Address - Email Address of person identified in data line <030> tcampbell@otcpas.com	tcampbell@otcpas.com

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charg

1/1/2014

<703>

State Univer	State Subscriber Line Charge State Univer	Residential Local Service Rate	Rate Type	SAC (CETC)	Exchange (ILEC)
<b>V</b>	 	 	  	<a3></a3>	<a2></a2>

<a1>&gt;</a1>	<a2></a2>	<a3></a3>	<	<	<	 	<	\$
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
MN	Donaldson		FR	16.1	0.0	0.0	0.0	16.1
MN	Halma		FR	16.45	0.0	0.0	0.0	16.45
MN	Karlstad		FR	16.45	0.0	0.0	0.0	16.45
MN	Strandquist		FR	16.45	0.0	0.0	0.0	16.45
MN	Lancaster		FR	16.45	0.0	0.0	0.0	16.45
MN	Wannaska		FR	16.95	0.0	0.0	0.0	16.95
MN	Malung		FR	16.95	0.0	0.0	0.0	16.95
MN	Roosevelt		FR	16.95	0.0	0.0	0.0	16.95
MN	Lake Bronson		FR	16.95	0.0	0.0	0.0	16.95
MN	Williams		FR	16.95	0.0	0.0	0.0	16.95
MN	Badger		FR	17.45	0.0	0.0	0.0	17.45
MN	Holt		FR	18.3	0.0	0.0	0.0	18.3
MN	Viking		FR	18.3	0.0	0.0	0.0	18.3
MN	Newfolden		FR	18.3	0.0	0.0	0.0	18.3
MN	Northwest Angle		FR	18.5	0.0	0.0	0.0	18.5
MN	Strathcona		FR	19.57	0.0	0.0	0.0	19.57
MN	Greenbush		FR	19.57	0.0	0.0	0.0	19.57
MN	Middle River		FR	20.92	0.0	0.0	0.0	20.92

Data Col	(7.20) produbbling Frice Offerings  Data Collection Form	FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	<010> Study Area Code	361505
<015>	<015> Study Area Name	WIKSTROM TEL CO, INC
<020>	<020> Program Year	2015
<030>	<030> Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	<035> Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	<039> Contact Email Address - Email Address of person identified in data line <030> tcampbell@otcpas.com	tcampbell@otcpas.com

<94>>	Usage Allowance Action Taken When Limit Reached {select}	Other, No limit on usage allowance															
	Usage Allowance (GB)	0.0	0.0	0.0	0.0	0.0											
<43>	Broadband Service Usag -Upload Speed (Mbps) (GB)	0.512	0.512	1.0	1.0	2.0											
<d2></d2>	Broadband Service - Broadband Service Download Speed -Upload Speed (Mb (Mbps)	1.5	3.0	0.0	12.0	18.0											
<c> <d1></d1></c>	Total Rates and Fees	29.95	29.95	29.95	29.95	29.95											
 	State Regulated Fees	0.0	0.0	0.0	0.0	0.0											
<	Residential Rate	29.95	29.95	29.95	29.95	29.95											
<a2></a2>	Exchange (ILEC)	A11	All	Al1	A11	All											
<a1></a1>	State	MN	MN	MN	MN	MN					_		_				
<711>		1	1	1	1	1	1	<u> </u>	<u> </u>	<u>I</u>	<u> </u>	 <u> </u>	<u> </u>				

(800) OF	(800) Operating Companies			FCC Form 481
Data Co	Data Collection Form			OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	361505		
<015>		WIKSTROM TEL CO,	CO, INC	
<020>				
<030>		Tom Campbell		
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.	t.	
<039>		tcampbell@otcpas.com	pas.com	
7010	Donowing Wiketrom melenhone Company Inc			
<811>	Holding Company			
<812>				
<813>	<a1></a1>		<a2></a2>	<a3></a3>
	Affiliates		SAC	Doing Business As Company or Brand Designation
	Wikstrom Telephone Company, Inc.		361505	Wiktel
Ī		_		

SAC: 361505 State: MN

Wikstrom Tel Co, Inc

Form 481 Line No. 112 Five Year Service Quality Improvement Plan

### **ATTACHMENT REDACTED IN ENTIRETY**

SAC: 361505 State: MN

Wikstrom Tel Co, Inc

Form 481 Line No. 510 Compliance with Service Quality Standards and Consumer Protection

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As required by MN. Rule "7812.0700 Minnesota General Service Quality Requirements. Subpart 1" the local services provided by Wikstrom Tel Co, Inc are provided under internal company operating procedures and publically available tariffs which are in compliance with applicable Minnesota Public Utility Commission orders and rules including:

7810.0100 DEFINITIONS. 7810.0200 SCOPE. 7810.0300 STATUTORY AUTHORITY.

### **RECORDS AND REPORTS**

7810.0400 RETENTION OF RECORDS.
7810.0500 DATA TO BE FILED WITH THE COMMISSION.
7810.0600 REPORT TO COMMISSION ON SERVICE DISRUPTION.
7810.0900 LOCATION OF RECORDS.

### **CUSTOMER RELATIONS**

7810.1000 INFORMATION AVAILABLE TO CUSTOMER AND PUBLIC. 7810.1100 COMPLAINT PROCEDURES. 7810.1200 RECORD OF COMPLAINT.

### **CUSTOMER BILLING; DEPOSIT AND GUARANTEE REQUIREMENTS**

7810.1400 CUSTOMER BILLING.

7810.1500 DEPOSIT AND GUARANTEE REQUIREMENTS.

7810.1600 DEPOSIT.

7810.1700 GUARANTEE OF PAYMENT.

### DISCONNECTION OF SERVICE; SERVICE DELAY

7810.1800 PERMISSIBLE SERVICE DISCONNECTIONS WITH NOTICE.

7810.1900 PERMISSIBLE SERVICE DISCONNECTIONS WITHOUT NOTICE.

7810.2000 NONPERMISSIBLE REASONS TO DISCONNECT SERVICE.

7810,2100 MANNER OF DISCONNECTION.

7810.2200 RECONNECTION OF SERVICE.

7810.2300 NOTICE REQUIREMENTS.

7810.2400 BILL DISPUTES.

7810.2500 ESCROW PAYMENTS.

7810.2600 WAIVING RIGHT TO DISCONNECT: EMERGENCY STATUS.

7810.2800 DELAY IN INITIAL SERVICE OR UPGRADE.

### **DIRECTORIES**

7810.2900 CONTENT OF DIRECTORIES.

7810.3000 DIRECTORY ASSISTANCE.

7810.3100 CHANGES OR ERROR OF LISTED NUMBER.

### **ENGINEERING**

7810.3200 CONSTRUCTION OF TELEPHONE PLANT.

7810.3300 MAINTENANCE OF PLANT AND EQUIPMENT.

7810.3900 EMERGENCY OPERATIONS.

Page 2 of 2

SAC: 361505 State: MN

Wikstrom Tel Co, Inc

Form 481 Line No. 510 Compliance with Service Quality Standards and Consumer Protection

\_\_\_\_\_

### **INSPECTIONS, TESTS, SERVICE REQUIREMENTS**

7810.4100 ACCESS TO TEST FACILITIES.

7810.4300 ACCURACY REQUIREMENTS.

7810.4900 ADEQUACY OF SERVICE.

7810.5000 UTILITY OBLIGATIONS.

7810.5100 TELEPHONE OPERATORS.

7810.5200 ANSWERING TIME.

7810.5300 DIAL SERVICE REQUIREMENTS.

7810.5400 INTEROFFICE TRUNKS.

7810.5500 TRANSMISSION REQUIREMENTS.

7810.5800 INTERRUPTIONS OF SERVICE.

7810.5900 CUSTOMER TROUBLE REPORTS.

7810.6000 PROTECTIVE MEASURES.

7810.6100 SAFETY PROGRAM.

Wikstrom Tel Co, Inc is in compliance with Federal CPNI rules, Red Flag Rules and other Federal and State requirements governing the protection of Customer's privacy.

O Page 1 of 1

SAC: 361505 State: MN

Wikstrom Tel Co, Inc

Form 481 Line No. 610 Description of Functionality in Emergency Situations

\_\_\_\_\_

Wikstrom Tel Co, Inc pursuant to MN Rule "7810.390 Emergency Operations" has:

- Established reasonable provisions to meet emergencies resulting from failures of lighting or power service, sudden and prolonged increases in traffic, illness of operators or from fire, storm, or acts of God including provisions for emergency power that meet or exceed the rule requirement to provide:
  - o A minimum of four hours of battery service in each central office.
  - A permanently installed power unit in exchanges exceeding 5000 lines.
  - Mobile power units that can be delivered on short notice and which can be readily.
     connected in offices without installed emergency power facilities.
- Has informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power, in the event of emergency in order to prevent or mitigate interruption or impairment of telecommunications service.

SAC: 361505 State: MN

Wikstrom Tel Co, Inc

Form 481, Line No. 920, Tribal Government Engagement Obligation

Wikstrom Tel Co, Inc serves the Red Lake Indian Reservation with phone and internet services. The two parties had conversations in 2013 regarding ongoing telecommunications service needs and priorities. See attached.

From: Cliff Tweedale [mailto:ctweedale@hrdc.org]

Sent: Wednesday, May 29, 2013 10:10 AM

To: Al Lundeen; Bill Brunelle; Cindy Buttleman (<a href="mailto:cindy.buttleman@state.mn.us">cindy.buttleman@state.mn.us</a>); <a href="mailto:Craig.Collison@dot.state.mn.us">Craig.Collison@dot.state.mn.us</a>; <a href="mailto:Dean">Dean</a>

Branchaud; Donald J. "Dudie" May; Edward Arnesen (edarnesen@wiktel.com); Harlan Beaulieu

(HBeaulieu@RedLakeNation.org); Jack Olson (jack.olson@state.mn.us); JoAnn Zutz; Les Peterson; Lori Dowling; Lu Tasa (Luane.Tasa@state.mn.us); Mike Carroll (mike.carroll@dnr.state.mn.us); Pat Graves; Thomas J. Peckham; Tim Erickson; Tim Fevold; Todd Beckel (toddbeckel@mncable.net); Tracey Stoll; Tracey Stoll; Valerie Gravseth; Wally Sparby

(wallysparby@mncable.net)

**Cc:** Hanson Tom (tom h@co.lake-of-the-woods.mn.us); Ken Moorman; buck n@co.lake-of-the-woods.mn.us; patty b@co.lake-of-the-woods.mn.us; Edward Arnesen (edarnesen@wiktel.com)

**Subject:** Update

Hello NW Angle Working Group:

It has been awhile since I gave you an update and status report for the initiative you all have helped so much with.

After our Open House in the NW Angle, there was much discussion among each governmental unit and organization about the next steps. While our draft position paper summarizing the tentative decisions made by you suggest we're pretty close, the comments from our open meetings in Lake of the Woods County highlighted the need to revisit a couple issues. I have been hopeful that over last summer each entity would be able to revisit internal policy on these issues, and then we could all meet. Unfortunately, other issues and commitments of working group members made that impossible.

I do not want you to get the impression that this issue is not important to any of the entities represented on the Working Group. This is an important issue, and it is one that will have to be resolved. After discussing this with several people, it is my hope that we can meet later this summer or first thing this Fall. I suggest that the Red Lake Tribal reps and Lake of the Woods County reps meet informally to reaffirm their commitment to move forward, and then we can proceed with the original working group.

Again, I appreciate your commitment to this effort, and hope that we can move forward again in 3 months.

Cliff



CLIFF TWEEDALE
Executive Director
218.252.1933 Cell
218.333.6538 Direct
218.444.4722 Fax
218.444.4732 General

ctweedale@hrdc.org

PO Box 906 Bemidji, MN 56619-0906

### **Wikstrom**

### **Telecom • Internet**

212 South Main St., Karlstad, MN 56732 Phone: (218) 436-5214 Fax: (218) 436-3102 Alan Lundeen, Plant Manager alundeen@wiktel.com

June 18, 2014

Honorable Harlan Beaulieu Red Lake Tribal Council-Red Lake Nation PO Box 550 Red Lake, MN 56671

Thomas J. Peckham Attorney at Law Nordhaus Las Firm, LLP 405 Martin Luther King, Jr. Ave NE Albuquerque, NM 87102

RE: FCC Transformation Order-Tribal Engagement

### Gentlemen,

The Federal Communications Commission in DA 12-1165 has issued guidance on the Tribal Engagement obligation adopted in the USF/ICC Transformation order. This obligation is intended to benefit Tribal Government leaders and service providers (ETC-Eligible Telecommunications Carrier) in their goals of providing greater connectivity and the benefits of universal service on tribal lands. We currently are not providing services to anyone on tribal lands.

The purpose of this letter is to describe the conditions and obligations to work together for this process to be successful and to document the progress to date. Wikstrom Telephone Co. has had a good relationship with the Red Lake Tribal Council since its first agreements to cross tribal lands at the Northwest Angle in 1993. We have appreciated the support and cooperation between us to provide telecommunication services to those on and adjacent to tribal lands at the Angle.

### Discussion points of DA 12-1165

1. Section II para 7: This section requires that we demonstrate annually that we have engaged with the Tribal governments and we have discussions related to 1) needs assessment; 2) feasibility planning; 3) marketing services; 4) right of way processes; and 5) compliance with Tribal business licensing.

- 2. Section III A. General Guidance: Wikstrom believes we have met the general requirements of this section as we have had on-going discussions, between principal decision makers of both sides thru the actions of our joint involvement in the working group, with our last update on May 29, 2013.
- 3. Section III para 14.: A certification is due to the FCC on July 1, 2013 and each year hereafter that we have mutually engaged.
- 4. Section III B. Needs Assessment: Wikstrom Telephone has filed tariffs and has service offerings on its website (<a href="www.wiktel.com">www.wiktel.com</a>) regarding services available at the NW Angle that are generally available to all residents, including Tribal members on Tribal lands. It is our understanding that there are no current community anchor institutions at the NW Angle, or any Tribal members unserved or waiting for service.
- 5. Section III C. Feasibility: Wikstrom Telephone will work with the Tribal Council to fulfill future requests for services at the NW Angle. We understand the challenges, as we have been providing service in this remote area and the Islands since the 1980's, and have invested hundreds of thousands of dollars in capital investment to provide fiber optic and copper facilities. Any insight on the long term development of the Tribal lands is welcomed and we look forward to coordinating future service needs.
- 6. Section III D. Marketing Services: Wikstrom Telephone strives to ensure all of its marketing efforts will be culturally and ethnically neutral for all of its customers. We welcome any suggestions and a future conversation that will provide joint direction to ensure we market services in a manner that meets the needs of the Tribal members. As this is a remote area, and few members reside in this area, we don't currently believe a retail presence in the community is necessary.
- 7. Section III E. Rights of Way: I believe our past history of working together since 1993 to provide right of way for telecommunications facilities demonstrates the joint commitment we have to serving the NW Angle. The meetings we had from 2011 to 2013 provided a new platform for agreement on managing the right of way and a new draft for Utility permitting was developed on February 14, 2012.
- 8. Section III F. Business Licensing: To date the Red Lake Tribal Council has not imposed a Business license fee on Wikstrom Telephone as no services are provided on Tribal lands, but do understand that telephone cables cross these lands to provide service to others. We understand and agree that a future license may be required as part of the larger Utility permit agreement.

In summary I believe we have met the requirements for 2013 in our meetings over the past 3 years and look forward to any additional insight and guidance from the Tribal Council.

Sincerely,

Alan Lundeen

Al Lundeen

P. Manager

SAC: 361505 State: MN

Wikstrom Tel Co Inc

Form 481 Line No. 1010 Descriptive document for Voice Services Rate Comparability

Line 1010 – Description of Voice Services Rate Comparability: Provide a detailed description of how your pricing of fixed voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as published annually by the Wireline Competition Bureau, as required in 47 C.F.R. § 54.313(a)(10).

On March 20, 2014 the Wireline Competition Bureau announced results of the Urban Rate Survey for Voice Services; as part the FCC Public Notice DA 14-384. Referenced in this public notice are the results required to meet the rate comparability as noted:

"Based on the survey responses, the Bureau also calculated the reasonable comparability benchmark for voice services to be \$46.96.9

9. Id. at 17694, para. 84."

As required Wikstrom Tel Co Inc hereby certifies that its current fixed voice services for residential subscribers as defined in the USF/ICC Transformation Order is below \$46.96.

SAC: 361505 State: MN

Wikstrom Tel Co, Inc

Form 481 Line No. 1210 Lifeline Plans Terms and Conditions

Wikstrom Tel Co, Inc does adhere to all Federal Lifeline eligibility rules and regulations as well as Minnesota Administrative Rule "7817.0400 - Eligibility for Telephone Assistance Credits" which states:

### Minnesota Administrative Rule 237 Chapter 7817.0400

**Subpart 1. Information provided.** Each local service provider shall annually mail a notice of the availability of the telephone assistance plan to each residential subscriber in a regular billing. If a subscriber has chosen to receive the regular billing other than through U.S. mail, the local service provider shall send the notice in a regular billing using the delivery method chosen by the subscriber for delivery of the regular billing. The notice must state the following: YOU MAY BE ELIGIBLE FOR ASSISTANCE IN PAYING YOUR TELEPHONE BILL IF YOU RECEIVE BENEFITS FROM CERTAIN LOW-INCOME ASSISTANCE PROGRAMS OR MEET CERTAIN INCOME LIMITS. FOR MORE INFORMATION OR AN APPLICATION FORM PLEASE CONTACT

<u>(local service provider)</u>. On request, the local service provider shall mail to a person an application form developed by the commission and the Department of Commerce, and a brochure that describes the telephone assistance plan's eligibility requirements and application process.

**Subpart 2. Application process.** On completing and signing the application certifying under penalty of perjury that the information provided by the applicant is true and that the statutory criteria for eligibility are satisfied, the applicant must return it to the local service provider for enrollment in the telephone assistance plan. An application may be made by the subscriber, the subscriber's spouse, or a person authorized by the subscriber to act on the subscriber's behalf.

Subpart 4. Eligibility criteria. To be eligible for a telephone assistance credit the applicant must:

- A. be a subscriber who resides in Minnesota or has moved to Minnesota and intends to remain; and
- B. be eligible for the federal Lifeline telephone service discount.

**Subpart 7. Applicant and recipient responsibilities.** Each applicant and each recipient shall provide current information to the local service provider about permanent changes that affect the applicant's or recipient's eligibility.

### Subpart 8. Local service provider responsibilities.

- A. A local service provider shall begin providing telephone assistance credits to an applicant in the earliest possible billing cycle but not later than the second billing cycle following submission of a completed application demonstrating eligibility. If certified, the local service provider shall notify the applicant by, for example, placing telephone assistance credits on the bill.
- B. If an applicant is denied eligibility, the local service provider shall notify the applicant in writing of the reasons for the denial, of the right to appeal, and of the right to reapply.

Page 2 of 3

SAC: 361505 State: MN

Wikstrom Tel Co, Inc

Form 481 Line No. 1210 Lifeline Plans Terms and Conditions

R	at	es
٠,	u	-

Wikstrom	Tel Co,	Inc's Lo	cal servic	e rates t	hat serve	as its	Lifeline F	Plans ar	e filed	in Compl	iance	with 1	the
regulatory	requir	ements	of Minn.	Rules Ch	. 7810 an	id Mini	n. Rules	pt. 781	2.0600	as follow	/S:		

A. The tariffs or price lists of local exchange carriers must offer the following services to all

customers pursuant to Minn. Rules pt. 7812.0600 (basic service requirements):
single party voice-grade service and touch-tone capability;
911 or enhanced 911 access;
<ul> <li>1 + intraLATA and interLATA presubscription and code-specific equal access to interexchange carriers subscribing to its switched access service;</li> <li>access to directory assistance, directory listings, and operator services;</li> <li>toll and information service-blocking capability without recurring monthly charges</li> <li>one white pages directory per year for each local calling area, which may include more than one local calling area, except where an offer is made and explicitly refused by the customer;</li> </ul>
a white pages and directory assistance listing, or, upon customer request, a private listing that allows the customer to have an unlisted or unpublished telephone number;
call-tracing capability according to chapter 7813;
(i) call Trace provisions in tariff mirror Commission's tariff templates.
blocking capability according to the Commission's ORDER ESTABLISHING CONDITIONS FOR THE PROVISION OF CUSTOMER LOCAL AREA SIGNALING SERVICES, Docket No. P999/CI-92-992 (June 17, 1993) and its ORDER AFTER RECONSIDERATION, Docket No. P999/CI-92-992 (December 3, 1993).
telecommunications relay service capability or access necessary to comply with state and federal regulations.

B. A Separate flat rate service offering is required pursuant to Minn. Rules pt. 7812.0600, subpt. 2. At a minimum, each local service provider (LSP) shall offer the services identified in Minn. Rules pt. 7812.0600, subpt. 1 as a separate tariff or price list offering on a flat rate basis. An LSP may also offer basic local service on a measured rate basis or in combination with other services. An LSP may impose separate charges for the services set forth in subpart 1 only to the extent permitted by applicable laws, rules, and commission orders.

SAC: 361505 State: MN

Wikstrom Tel Co, Inc

Form 481 Line No. 1210 Lifeline Plans Terms and Conditions

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C. Service area obligations under Minn. Rules pt. 7812.0600, subpt. 3: An LSP shall provide its local services on a nondiscriminatory basis, consistent with its certificate under part 7812.0300 or 7812.0350, to all customers who request service and whose premises fall within the carrier's service area boundaries or, for an interim period, to all requesting customers whose premises fall within the operational areas of the local service provider's service area under part 7812.0300, subpart 4, or 7812.0350, subpart 4. The obligation to provide resale services does not extend beyond the service capability of the underlying carrier whose service is being resold. The obligation to provide facilities-based services does not require an LSP that is not an eligible telecommunications carrier (ETC) to build out its facilities to customers not abutting its facilities or to serve a customer if the local service provider cannot reasonably obtain access to the point of demarcation on the customer's premises.

The flat rate services, offered pursuant to Minn. Rules pt. 7812.0600, subpt. 2., include unlimited local service minutes of use. The local services offerings do not include any toll minutes of use. The rates for any toll usage are determined by the rate plans of the Toll Provider(s) that end users are selected by lifeline by end users.

The specific Company terms and conditions for the Companies Lifeline Plans are set forth in the tariff pages included in Exhibit 1, attached.

Exhibit 1

SAC: 361505 State: MN

Wikstrom Tel Co, Inc

Form 481 Line No. 1210 Lifeline Plans Terms and Conditions

WIKSTROM TELEPHONE COMPANY KARLSTAD, MINNESOTA

Section 4 Page 1

### SCHEDULE OF MONTHLY RATES

		ı	Montl	nly Charges		
	A	ccess Line		EAS		
Class of Service	_	Charge	Ac	ditive		Total
Badger Exchange						
Business:						
One-Party Access Line	\$	25.50			\$	25.50
Residence: One-Party Access Line	\$	17.45			\$	17.45
Donaldson Exchange						
Business: One-Party Access Line	\$	24.10			\$	24.10
Residence: One-Party Access Line	\$	16.10			\$	16.10
Greenbush Exchange						
Business: One-Party Access Line	\$	25.05	\$	3.88	\$	28.93
Residence: One-Party Access Line	\$	16.95	\$	2.62	\$	19.57
Halma Exchange						
Business: One-Party Access Line	\$	24.60			\$	24.60
Residence: One-Party Access Line	\$	16.45			\$	16.45
Holt Exchange						
Business: One-Party Access Line	\$	26.45			\$	26.45
Residence: One-Party Access Line	\$	18.30			\$	18.30
			Bus	siness	Res	sidential
EAS Additive:						
Facility Cost Lost Access Revenue			\$	0.35 3.53	\$	0.23 2.39
Total			\$	3.88	\$	2.62

WIKSTROM TELEPHONE COMPANY KARLSTAD, MINNESOTA

Section 4 Page 1A

### SCHEDULE OF MONTHLY RATES

		N	/lonth	nly Charges	
	A	ccess Line		EAS	
Class of Service	_	Charge	Ad	<u>Iditive</u>	 Total
Karlstad Exchange					
Business:					
One-Party Access Line	\$	24.60			\$ 24.60
Residence: One-Party Access Line	\$	16.45			\$ 16.45
Lake Bronson Exchange					
Business: One-Party Access Line	\$	25.05			\$ 25.05
Residence: One-Party Access Line	\$	16.95			\$ 16.95
Lancaster Exchange					
Business: One-Party Access Line	\$	24.60			\$ 24.60
Residence: One-Party Access Line	\$	16.45			\$ 16.45
Malung Exchange					
Business: One-Party Access Line	\$	25.05			\$ 25.05
Residence: One-Party Access Line	\$	16.95			\$ 16.95
Middle River Exchange					
Business: One-Party Access Line	\$	26.45	\$	3.88	\$ 30.33
Residence: One-Party Access Line	\$	18.30	\$	2.62	\$ 20.92

WIKSTROM TELEPHONE COMPANY KARLSTAD, MINNESOTA

Section 4 Page 1B

### SCHEDULE OF MONTHLY RATES

	Monthly Charges
	Access Line EAS
Class of Service	Charge Additive Total
Newfolden Exchange	
Business:	
One-Party Access Line	\$ 26.45 \$ 26.45
Residence: One-Party Access Line	\$ 18.30 \$ 18.30
Northwest Angle Exchange	
Business: One-Party Access Line	\$ 30.00 \$ 30.00
Residence: One-Party Access Line	\$ 18.50 \$ 18.50
Roosevelt Exchange	
Business: One-Party Access Line	\$ 25.05 \$ 25.05
Residence: One-Party Access Line	\$ 16.95     \$ 16.95
Shandquist Exchange	
Business: One-Party Access Line	\$ 24.60 \$ 24.60
Residence: One-Party Access Line	\$ 16.45 \$ 16.45
Strathcona Exchange	
Business: One-Party Access Line	\$ 25.05 \$ 3.88 \$ 28.93
Residence: One-Party Access Line	\$ 16.95     \$ 2.62     \$ 19.57

WIKSTROM TELEPHONE COMPANY KARLSTAD, MINNESOTA

Section 4 Page 1C

### SCHEDULE OF MONTHLY RATES

	Monthly Charges	
	Access Line EAS	
Class of Service	<u>Charge</u> <u>Additive</u>	<u> Fotal</u>
Viking Exchange		
Business:		
One-Party Access Line	\$ 26.45 \$	26.45
Residence: One-Party Access Line	\$ 18.30 \$	18.30
Wannaska Exchange		
Business: One-Party Access Line	\$ 25.05 \$	25.05
Residence: One-Party Access Line	\$ 16.95 \$	16.95
Williams Exchange		
Business: One-Party Access Line	\$ 25.05 \$	25.05
Residence: One-Party Access Line	\$ 16.95 \$	16.95

SAC: 361505 State: MN

Wikstrom Tel Co, Inc

Form 481 Line No. 3017 RUS Annual Report

### **ATTACHMENT REDACTED IN ENTIRETY**